



Acumen Logistics Group – Privacy and Cookie Policy

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: **"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person"**.

Acumen Logistics Group Ltd collects and processes data relating to our customers in order to manage the initial and on-going relationship. The organisation is committed to processing personal information about its customers in ways that comply with its legal and regulatory obligations and to being transparent about how it collects and uses that data. In doing so we observe the UK Data Protection legislation, and are committed to protecting and respecting our customer's privacy and rights.

As such we act as the "Data Controller" This means we decide on how your personal data is processed and for what purposes.

Data collection

We may collect personal information which we receive when:

- you use our website
- you use our services
- you contact us or
- you are a recipient of our services.

We may collect and process the following types of information:

- your name, address, email address, telephone number(s) and other contact details within your organisation;
- the terms and conditions of your relationship with us;
- information required to provide you with a service, and details of our services that you have used;
- your payment information such as credit or debit card details and bank account details;
- for certain applications, information about credit risk and suitability to trade.

Why do we collect this information?

The organisation needs to process data to enter into a trading service contract with you and to meet its obligations under that contract. In some cases the organisation needs to ensure that it is complying with its legal obligations. In other cases the organisation has a



legitimate interest in processing personal data before during and after the end of the relationship. Processing client data allows the organisation to:

- Provide you with services that you may request from us.
- Enable business development including sending information updates
- Meet our legal and regulatory obligations.
- Deliver requested information to you about our services
- Ensure the billing of any services and obtain payment
- Process and respond to any complaints

We are committed to keeping your information up to date as far as is reasonably possible. However if you believe that we have made an error, then please contact us as we have outlined below and we will use reasonable endeavours to correct it.

Who has access to data?

The information you provide to us will be treated by us as confidential and will be processed only by our employees within the UK/EEA. We may disclose your information to other third parties who act for us for the purposes set out in this notice or for purposes approved by you.

How does the organisation protect data?

We take the security of your data seriously and strive to comply with our obligations at all times, Any personal information which is collected, recorded or used in any way, whether on paper or online will have appropriate safeguards applied in line with our data protection obligations.

The organisation has the following policies and controls in place to try and ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

- Information Security Policy
- Data Protection Policy
- Data Breach Notification Policy

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data

Our Service Providers

This includes external third-party service providers, such as accountants, auditors, experts, lawyers and other outside professional advisors; IT systems, marketing, outsourced service providers that assist us in carrying out business activities.



How long do we keep personal information?

We will only retain customers' personal information for as long as it needs it to carry out a particular purpose or meet a particular obligation.

Website Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to

the server each time the browser requests a page from the server. Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies.

This website will store the following 3rd party cookies:

- Cookies for social media sharing using the platform "AddThis", their privacy policy can be found here: <http://www.addthis.com/privacy/privacy-policy>. These cookies use the following names: bku, loc, mus, na_id, na_tc, oid, ssc, ssh, sshs, uid, uit, uvc, _ceg.u, _ceg.s, __unam, __lc.visitor, __cfduid, __atuvs

- Cookies for Google analytics. We use this to view website statistics; the privacy policy for this service can be found here: <http://www.google.com/privacypolicy.html>. These will use the following names: _ga, _gid, _gat.

The website will also store a session cookie used to improve user experience but will not hold any personal information.

You have the right to refuse or disable cookies served through our website although, if you choose to do so, certain functionality may become unavailable to you. As the means by which you may do this vary from browser to browser, we recommend that you visit your browser's help menu for further information.

We respect your right to choose whether or not to accept cookies.

Please note that if you do not set your browser and e-mail settings to disable cookies, you will be indicating your consent to receive them.

Your Rights

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.



- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to complain to the ICO.

Changes to our Privacy Policy:

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated in May 2018

How to contact us:

Please contact us if you have any questions about our privacy policy or about information we hold about you:

By email : GDPR@acumen-dist.co.uk

Or write to us at :

Acumen Logistics

Park Circle

Tithe Barn Way

Northampton

NN4 9YU

Issue	Description of change	Approval	Date of issue